

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

| | | |
|-------------------------------------|---|--------------------------------|
| VERMONT MUTUAL INSURANCE COMPANY |) | CIVIL ACTION |
| as subrogee of TIMOTHY D. STEIN and |) | |
| WAYNE ROLF, |) | NO. 05-10307 JLT |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| DAVID'S FLOOR SERVICE, INC., |) | AFFIDAVIT OF |
| |) | JOSEPH F. RICH, ESQUIRE |
| and |) | PRO HAC VICE |
| |) | |
| MIN DANG, d/b/a |) | |
| DAVID'S FLOOR SERVICE, |) | JURY TRIAL DEMANDED |
| |) | |
| |) | |
| Defendants. |) | |

I, JOSEPH F. RICH, ESQUIRE, being duly sworn, depose and say:

1. I am a resident of the Commonwealth of Pennsylvania, a practicing attorney in Philadelphia, Pennsylvania and an associate at the law firm of Cozen O'Connor, located at 1900 Market Street, Philadelphia, Pennsylvania.

2. I am duly licensed and admitted to practice law by the Commonwealth of Pennsylvania, having Attorney Identification No. 92067. [A copy of my Certificate of Good Standing is annexed hereto].

3. I am a member in good standing of the Bars of the Commonwealth of Pennsylvania, the State of New Jersey, the District of Columbia, and the United States District Court for the Eastern District of Pennsylvania.

4. I have never been held in contempt of court, censured, suspended or disbarred by any court.

5. An established attorney-client relationship exists between Plaintiff and my firm, and my client has requested that I assist in representing its interests in this matter.

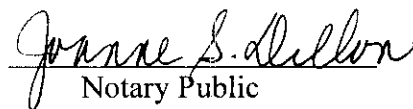
6. The nature of this action involves complex legal and factual issues pertaining to fire and property damage litigation. I have handled these types of cases in the past and have developed an expertise in these matters.

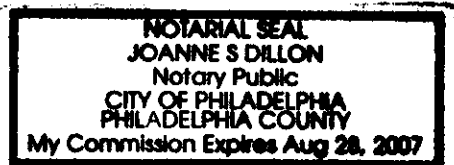
7. If the Court shall allow my Motion to Appear *Pro Hac Vice* in the above-captioned matter, I will continue to represent my client in this proceeding until the final determination hereof and with reference to all matters, incidents, or proceedings, I agree that I shall be subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court and the Bar of the Commonwealth of Massachusetts in all respects, as if I were regularly admitted and a licensed member.

8. I am associated with Patrick J. Loftus, III, Esquire, an attorney who is duly and legally admitted to practice in the Commonwealth of Massachusetts, and upon whom service may be had in all matters connected with the above-captioned case and any disciplinary matter arising out of same, with the same effect as if personally made on me.


JOSEPH F. RICH, ESQUIRE

Sworn to and subscribed
before me this 8 day
of April, 2005.


Notary Public





Supreme Court of Pennsylvania

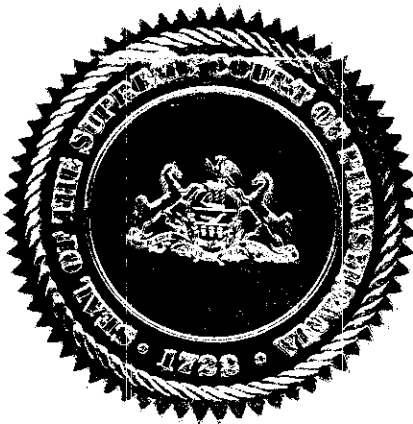
CERTIFICATE OF GOOD STANDING

Joseph Frank Rich, Esq.

DATE OF ADMISSION

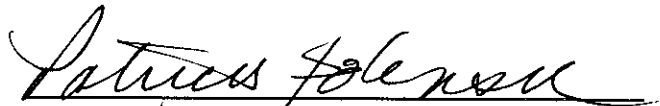
December 9, 2003

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 6, 2005


Patricia A. Johnson
Chief Clerk